

# Exhibit 16

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X  
5 SANDRA GUZMAN,

6 Plaintiff,

7 -against- 09CIV9323

8 (BSJ) (RLE)

9 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a  
10 THE NEW YORK POST, and COL ALLAN, in his  
11 official and individual capacities,  
12 Defendants.

13 -----X  
14  
15

16 DEPOSITION OF LES GOODSTEIN

17 New York, New York

18 June 15, 2012  
19

20 Reported by:

21 MARY F. BOWMAN, RPR, CRR

22 JOB NO. 50553  
23  
24  
25

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A. My current title is senior VP, News Corp.

Q. Senior VP News Corp.? Do you have a business card?

A. Yes.

Q. Could we have one.

A. Do you want --

MR. LERNER: We will take that request under advisement. But Mr. Goodstein is not going to produce documents at the deposition.

Q. Can you read your business card to us?

MR. LERNER: No, no. Objection.

Q. How long have you been senior VP of News Corp.?

A. I work for News America Incorporated.

Q. I am sorry, the question is how long have you been a senior VP of News Corporation?

MR. LERNER: Objection. He answered you.

Q. So your title is senior VP, News

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Corporation? Has your title changed -- let me take a step back.

How long have you worked in your current position?

A. Six and a half years.

Q. Who is your employer?

A. News America Incorporated.

Q. Have you had the title senior VP of News Corp. for the entire six and a half years?

MR. LERNER: Objection.

Q. Do you understand the question? Have you had the title senior VP of News Corp. for the last six and a half years?

A. Yes.

Q. What is your current e-mail address?

A. LGoodstein@NewsCorp.com.

Q. And has that e-mail address been the same for the last six and a half years?

A. Yes.

Q. And that's your business e-mail address, correct?

A. Correct.

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GOODSTEIN

Q. And LGoodstein@NewsCorp.com, that would be where you receive business e-mails from employees of the New York Post?

A. Yes.

Q. Could you describe your educational background for me beginning with undergraduate?

A. East Meadow High School, bachelor of arts, Stony Brook University.

Q. What university was that?

A. Stony Brook, New York -- State University of New York, Stony Brook.

Q. What was your major?

A. Sociology.

Q. Do you have any other degrees other than your bachelor of arts?

A. No.

Q. Did you ever attend graduate school?

A. No.

Q. After you graduated university, what was your first full-time job?

A. Fullman Diet Company.

Q. Do you recall what year you began

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at Fullman?

A. 1974.

Q. And how long did you work for Fullman?

A. Short period of time, maybe a year.

Q. Where did you work after Fullman full-time?

A. General Nutrition Corporation.

Q. How long did you work for General Nutrition?

A. Two years.

Q. So this would have been until around '76, '77?

A. '75. mid '75.

Q. And what was your next full-time job after General Nutrition?

A. I was an account executive at Newsday.

Q. Is that in New York?

A. It is on Long Island.

Q. What do you mean when you say you were an account executive? Can you describe more what your job entailed?

A. Sold advertising space.

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A. Yes.

Q. What was that? What was the next one?

A. Executive vice president, executive vice president.

Q. Of the Daily News?

A. Yes.

Q. Do you recall what year you became executive vice president?

A. '96.

Q. How long were you executive vice president?

A. About four years.

Q. Did you have any other positions at the Daily News after the four years as executive vice president?

A. Yes.

Q. What was that?

A. President, chief operating officer.

Q. How long were you president and chief operating officer?

A. Five or six years.

Q. Did you have any other positions at the Daily News after president, chief

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operating officer?

A. That was it.

Q. There was pretty much no place else to go, right?

MR. LERNER: Objection.

Q. Was there -- was there anyone above you when you were president and chief operating officer? Did you have a supervisor?

A. Yes.

MR. LERNER: Objection.

Q. Who was that?

A. Mort Zuckerman.

Q. Where did you go after you left as president of the Daily News?

A. News America Incorporated.

Q. And tell me who Mort Zuckerman is?

A. Mort Zuckerman was the owner of the Daily News. He is also the chairman of the Boston Properties.

Q. You said after you left the Daily News, you went to News America Incorporated?

A. Yes.

Q. Is that correct?

Who hired you for this position?

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A. Paul Carlucci.

Q. And is, has your position changed since Paul Carlucci hired you?

MR. LERNER: Objection.

You can answer.

A. Repeat the question.

Q. Let me back up. What year did Paul Carlucci hire you?

A. 2005. Started in 2006.

Q. So I believe you said before that you have had the same position for the last six and a half years, correct?

A. Yes.

Q. So my question is since Paul Carlucci hired you in 2005, started in 2006, has your job title changed in that period of time?

MR. LERNER: Objection.

You can answer.

A. No.

Q. Who is your current supervisor at your current position?

A. Paul Carlucci.

Q. Has anyone else ever been your

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supervisor at your current position, other than Paul Carlucci?

A. No.

Q. Have you ever known News Corporation to mislead the public?

MR. LERNER: Objection.

A. No.

Q. Have you ever known News Corporation to issue a false press release?

MR. LERNER: Objection.

A. The answer is no.

Q. Would you agree that if News Corporation were to issue a false press release, that would be unethical?

MR. LERNER: Objection.

A. I don't understand your question.

Q. Do you think it would be wrong to issue a press release which was false?

MR. LERNER: Objection.

A. The answer is no.

Q. You don't believe it would be wrong?

A. Can I have the question again.

Q. Read the question back.

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1 GOODSTEIN  
 2 Is it your understanding, sir, that  
 3 you had joined News Corporation?  
 4 MR. LERNER: Objection.  
 5 A. I don't know.  
 6 Q. You don't know what your  
 7 understanding is?  
 8 MR. LERNER: Objection.  
 9 A. I'm an employee of News America  
 10 Incorporated. News America Incorporated is a  
 11 subsidiary of News Corp. That's my answer.  
 12 Q. You said you saw this press release  
 13 when it came out in the newspaper, correct?  
 14 A. Yes.  
 15 Q. You testified earlier you believed  
 16 it's wrong for a corporation to issue a press  
 17 release which was incorrect, right?  
 18 MR. LERNER: Objection.  
 19 Q. Was that your testimony?  
 20 A. Yes.  
 21 Q. So did you ever make any effort to  
 22 go to Rubenstein or anyone else and say, wait  
 23 a minute, I'm not sure if this is correct or  
 24 not?  
 25 MR. LERNER: Objection.

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1 GOODSTEIN  
 2 in this press release authorized by you?  
 3 A. No.  
 4 Q. So Rubenstein did not have your  
 5 authorization to make the statement, "I could  
 6 not imagine a more exciting time to join News  
 7 Corporation"?  
 8 A. Correct.  
 9 Q. So is this statement,  
 10 "Mr. Goodstein said, 'I could not imagine a  
 11 more exciting time to join News  
 12 Corporation,'" a true statement?  
 13 MR. LERNER: Objection.  
 14 Q. So your answer is going to have to  
 15 be yes, no or I don't know. That's what the  
 16 court has instructed.  
 17 A. I don't know.  
 18 Q. So you don't know whether or not it  
 19 is a true statement?  
 20 A. Yes.  
 21 Q. Did you ever tell anyone at any  
 22 time that you were joining News Corporation?  
 23 A. I don't recall.  
 24 Q. Have you ever told anyone at any  
 25 time that you worked for News Corporation?

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1 GOODSTEIN  
 2 A. No.  
 3 Q. Why not?  
 4 A. I don't know.  
 5 Q. You don't know why you did that?  
 6 A. I don't know why I didn't do that.  
 7 I don't know.  
 8 Q. Let's go down to the third  
 9 paragraph. It says, "Mr. Goodstein said, 'I  
 10 cannot imagine a more exciting time to join  
 11 News Corporation.'"  
 12 Is that a true statement?  
 13 MR. LERNER: Objection.  
 14 A. Those are not my words.  
 15 Q. Is it a true statement?  
 16 MR. LERNER: Objection.  
 17 A. Those are not my words.  
 18 Q. That's not the question, sir. He  
 19 is doing it again. This is a simple  
 20 question.  
 21 MR. LERNER: I don't even  
 22 understand the question.  
 23 A. I don't understand the question  
 24 either.  
 25 Q. Was this statement that's contained

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1 GOODSTEIN  
 2 A. I don't recall.  
 3 (Pause)  
 4 Q. Sir, what does your business card  
 5 say? What does it read?  
 6 A. Can I go back and straighten  
 7 something out for the record?  
 8 Q. Go ahead.  
 9 A. I did authorize -- again, could you  
 10 read back what I said before about the  
 11 authorization of Rubenstein?  
 12 Q. Before we you do that, could the  
 13 record reflect that this was after consulting  
 14 with Mr. Lerner, Mr. Goodstein wants to  
 15 correct something.  
 16 Could you read back the last  
 17 question, please.  
 18 A. About the authorization of my  
 19 remarks on the press release.  
 20 Q. Go ahead, tell me what you want to  
 21 correct.  
 22 A. I did authorize --  
 23 MR. THOMPSON: Wait, I am sorry.  
 24 Mr. Lippner, please stop talking. The  
 25 witness is being deposed. You are

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GOODSTEIN

Q. And you never contacted Mr. Rubenstein to tell him that there was something inaccurate in the press release, correct?

A. Correct.

Q. So it is fair to say that when you read this press release, when it was published, you believed everything in it was accurate, correct?

A. Yeah, I -- I don't know.

Q. What do you mean you don't know? You don't remember if you believed that everything in it was accurate?

A. I don't know.

Q. I am sorry, I'm just not following you. Are you saying that you don't remember or you -- I don't know what you mean by I don't know.

MR. LERNER: Could we have the question read back, please.

(Record read)

A. I don't know.

Q. You don't know what you believed at the time?

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GOODSTEIN

A. Rephrase the question.

(Record read)

A. Correct.

Q. OK. What does your business card say?

MR. LERNER: Objection.

A. Senior vice president.

Q. The entire business card, what does it say from top to bottom?

MR. LERNER: If you know.

A. Les Goodstein, senior vice president.

Q. That is all it says?

A. I believe so.

Q. It doesn't say any company?

A. News Corp. on the top.

Q. It says News Corp.?

A. Yes.

Q. It says N-E-W-S, C-O-R-P?

A. Yes.

Q. P with a period or no period?

A. I don't know.

Q. OK. Does it say News America anywhere on the business card?

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GOODSTEIN

A. No.

Q. It says News Corp.?

A. Yes.

Q. OK. So it says News Corp. on the top line?

A. I'm not sure. It says News Corp.

Q. It says News Corp., senior VP or senior vice president?

A. Senior vice president.

Q. OK. And then it has your name?

A. Yes.

Q. And it does it have contact information?

A. Yes.

Q. Do you remember what the contact information is?

A. The phone number.

Q. OK. E-mail address?

A. E-mail address.

Q. OK. How long have your business cards read what you just testified to?

A. Approximately six and a half years.

Q. OK. And in those six and a half years, just a rough estimate, how many people

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would you say you have given business cards to?

A. Hundreds.

Q. Hundreds? OK. For example, do you recall the last person you gave a business card to?

A. I don't, no.

Q. Now, when you give a business card to someone that says News Corp., would it be reasonable for them to think that you work for News Corporation?

MR. LERNER: Objection.

A. I don't know.

Q. When you give a business card to someone that says News Corp., have you ever said, I actually work for News America Marketing?

MR. LERNER: Objection.

A. I've never said that, no.

Q. Never said that?

A. Not News America Marketing, no.

Q. So you have never introduced yourself -- let me just make sure. Who is it that you say you work for?

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1 GOODSTEIN  
 2 overview. What sorts of areas it would  
 3 involve?  
 4 MR. LERNER: Objection.  
 5 A. It is -- I don't really -- your  
 6 question is too broad.  
 7 Q. OK.  
 8 A. You have got to pinpoint it a  
 9 little bit for me.  
 10 Q. Well, what would be a typical area  
 11 that the committee would make recommendations  
 12 on?  
 13 MR. LERNER: Objection.  
 14 A. Pricing the newspaper.  
 15 Q. I am sorry, say again?  
 16 A. Price of the newspaper.  
 17 Q. Price of the newspaper, OK. So if  
 18 an issue about price of the newspaper came  
 19 up, how would the executive committee handle  
 20 that?  
 21 MR. LERNER: Objection.  
 22 A. I can't give you a speculative  
 23 answer on that. I don't know.  
 24 Q. Is this an issue that's ever  
 25 actually come up in executive committee

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1 GOODSTEIN  
 2 A. I started attending meetings my  
 3 first day which was January 3, 2006.  
 4 Q. And who appointed you as a member?  
 5 MR. LERNER: Objection.  
 6 A. I don't recall, but it would have  
 7 been Paul Carlucci because I reported to him.  
 8 Q. And you said it meets once a week?  
 9 A. Meets once a week.  
 10 Q. Where does it meet?  
 11 A. Usually it meets on the third floor  
 12 of 1211 Sixth Avenue.  
 13 Q. You say usually. I take it there  
 14 is times it does not meet there?  
 15 A. Rarely.  
 16 Q. Does it always meet at 1211 though?  
 17 A. For the last couple of years, I  
 18 would say so, yes.  
 19 Q. Can we mark this as 5.  
 20 (Exhibit 5, document Bates stamped  
 21 NYP 440 through 442 marked for  
 22 identification, as of this date.)  
 23 Q. If you could just take a look at  
 24 that for me, sir. For the record, this is  
 25 Bates stamped NYP 440 through 442. And can

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1 GOODSTEIN  
 2 meetings, the price of the newspaper?  
 3 A. Yes.  
 4 Q. How did the price of the newspaper  
 5 come up in the executive committee meeting?  
 6 MR. LERNER: Objection.  
 7 A. It was discussed, all the  
 8 ramifications, pro and con.  
 9 Q. And then was there some kind of a  
 10 vote taken?  
 11 A. No.  
 12 Q. So who made the ultimate decision  
 13 on the price of the newspaper?  
 14 A. The publisher.  
 15 Q. Paul Carlucci?  
 16 A. Yes.  
 17 Q. So with respect to the price, the  
 18 committee basically debated it and made a  
 19 recommendation to Mr. Carlucci and he made  
 20 the ultimate decision? Is that what you are  
 21 saying?  
 22 MR. LERNER: Objection.  
 23 A. Yes.  
 24 Q. When did you first become a member  
 25 of the executive committee?

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1 GOODSTEIN  
 2 you tell me what this document is,  
 3 Mr. Goodstein?  
 4 A. It is partial minutes from the  
 5 executive committee.  
 6 Q. Have you seen minutes like this  
 7 before?  
 8 A. Yes.  
 9 Q. Are there basically minutes like  
 10 this for every meeting that the committee  
 11 has?  
 12 MR. LERNER: Objection.  
 13 A. Yes.  
 14 Q. Would there ever be, to your  
 15 knowledge, an executive committee meeting  
 16 that did not have an agenda like this?  
 17 MR. LERNER: Objection.  
 18 A. No.  
 19 Q. As far as you know, there is always  
 20 an agenda for the meeting?  
 21 A. Always an agenda.  
 22 Q. Now, if you look at the second  
 23 page, it says Tempo update. Do you see that?  
 24 A. Yes.  
 25 Q. What was your role with Tempo at



|  |   |
|--|---|
| <p style="text-align: right;">Page 90</p> <p>1                   GOODSTEIN</p> <p>2   this point in time, which is, this is dated,</p> <p>3   it looks like 12/18/06.</p> <p>4       A.   When I first came to the executive</p> <p>5   committee and I first joined News America</p> <p>6   Inc., I -- my role was, again, I could pick</p> <p>7   and choose the areas that I wanted to get</p> <p>8   involved with, with respect to the New York</p> <p>9   Post. At one of the meetings, I recall that</p> <p>10   there was a report given that Tempo was</p> <p>11   losing money and it was going to close.</p> <p>12       I have had a lot of experience with</p> <p>13   the Hispanic community. I started Viva</p> <p>14   Magazine when I was at the Daily News, in</p> <p>15   1992. It was the first Hispanic-type</p> <p>16   newspaper magazine/supplement of its kind,</p> <p>17   very successful. I wanted to see if I could</p> <p>18   help resuscitate Tempo.</p> <p>19       I also viewed it as a personal</p> <p>20   challenge. I was eager to prove myself. I</p> <p>21   was eager to show the committee and my boss</p> <p>22   that he had made the right decision in hiring</p> <p>23   me.</p> <p>24       So I basically volunteered on a</p> <p>25   temporary basis to get involved with Tempo</p> | <p style="text-align: right;">Page 91</p> <p>1                   GOODSTEIN</p> <p>2   and to help the ad sales. The big problem</p> <p>3   with Tempo was there weren't enough</p> <p>4   advertising pages, plain and simple. So the</p> <p>5   revenues were really suffering.</p> <p>6       Q.   When you say there weren't enough</p> <p>7   advertising, what period of time are you</p> <p>8   talking about?</p> <p>9       A.   Rephrase your question, I want to</p> <p>10   make sure I understand it.</p> <p>11       Q.   I just wanted to clarify. You said</p> <p>12   the problem with Tempo is there wasn't enough</p> <p>13   advertising. Are you referring to the entire</p> <p>14   period you were involved or was there --</p> <p>15       A.   No, no. Prior to my involvement.</p> <p>16       Q.   That's what I wanted to clarify.</p> <p>17       A.   Prior to my involvement. I don't</p> <p>18   know, I can't recall how far back Tempo was</p> <p>19   in the red. All I could tell you is that</p> <p>20   when I arrived, Tempo was in the red.</p> <p>21       Q.   And so this meeting on 12/18/06,</p> <p>22   this was due to your involvement in trying to</p> <p>23   save Tempo?</p> <p>24       MR. LERNER: Objection.</p> <p>25       A.   I don't understand the question.</p> |
| <p style="text-align: right;">Page 92</p> <p>1                   GOODSTEIN</p> <p>2       Q.   Let me simplify. Why were you</p> <p>3   giving a Tempo update to the executive</p> <p>4   committee on 12/18/06?</p> <p>5       A.   Because, again, on a temporary</p> <p>6   basis, I was helping out the Tempo team.</p> <p>7   Were updates to the executive committee</p> <p>8   something you did frequently on Tempo?</p> <p>9       MR. LERNER: Objection.</p> <p>10       A.   I don't recall.</p> <p>11       Q.   Can you tell me what steps you took</p> <p>12   to improve the advertising for Tempo?</p> <p>13       A.   I really worked very hard.</p> <p>14       Q.   And just briefly.</p> <p>15       A.   I, as I mentioned before, I had a</p> <p>16   lot of advertising, a ton of advertising</p> <p>17   contacts that had -- that I had worked with</p> <p>18   at the Daily News and at Viva Magazine.</p> <p>19       So I immediately got on the phone,</p> <p>20   made sales calls and saw these people to get</p> <p>21   them into Tempo. That included Macy's,</p> <p>22   Verizon, Long Island University. So I worked</p> <p>23   my end, my contacts very, very hard.</p> <p>24       The second part was I had wanted to</p> <p>25   focus on -- I had great success at the Daily</p>            | <p style="text-align: right;">Page 93</p> <p>1                   GOODSTEIN</p> <p>2   News -- issues that focused on events. So I</p> <p>3   wanted to make sure is that we had some kind</p> <p>4   of an event or editorial agenda each and</p> <p>5   every month to sell around. So I tried to</p> <p>6   assist the team in that area.</p> <p>7       And the third area was that, I</p> <p>8   don't know if I am a good salesperson or not,</p> <p>9   but I persuaded -- I don't remember who, but</p> <p>10   to accept Spanish-speaking ads, Spanish</p> <p>11   language ads which helped a lot.</p> <p>12       Q.   You talked about assisting a team.</p> <p>13   Who was on your team?</p> <p>14       MR. LERNER: Objection.</p> <p>15       A.   Well, it was the New York Post</p> <p>16   team.</p> <p>17       Q.   What team are you referring to?</p> <p>18       A.   Tempo.</p> <p>19       Q.   New York Post as a whole?</p> <p>20       A.   The people who worked at Tempo.</p> <p>21       Q.   So who specifically are you</p> <p>22   referring to? What individuals that worked</p> <p>23   at Tempo?</p> <p>24       A.   Sami Haiman Marrero, S-A-M-I,</p> <p>25   H-E-Y-M-A-N, M-A-R-R-E-R-O.</p>  |



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1 GOODSTEIN  
2 committee on that date?

3 A. I don't recall making this  
4 presentation, but I could have.

5 Q. Well, what does that mean? I want  
6 to understand the document. This document  
7 says, "Tempo update, Les Goodstein." What  
8 does that mean?

9 A. An update report on how Tempo is  
10 doing.

11 Q. So that indicates that you made a  
12 presentation to the executive committee about  
13 how Tempo was doing, right?

14 MR. LERNER: Objection.

15 A. It doesn't say that.

16 Q. Well, that's what I am -- what does  
17 it mean? If it has something on an agenda  
18 item and a name, what does that mean?

19 A. Update is a very broad -- I don't  
20 remember making the presentation. I don't  
21 remember what the update consisted of.

22 Q. OK. But you would have done some  
23 sort of an update, is that fair to say?

24 A. Yes.

25 Q. But you don't recall if the

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1 GOODSTEIN

2 specific papers that are attached were the  
3 update that you did?

4 A. I don't recall.

5 MR. CLARK: It is a couple minutes  
6 to 1. Why don't we go ahead and break.  
7 Should we say, let's say, 2 o'clock,  
8 let's try and get back promptly at 2 if  
9 we can and hopefully we can wrap this up  
10 in a few hours.

11 MR. LERNER: OK.

12 THE VIDEOGRAPHER: Going off the  
13 record, the time is 12:59 p.m.

14 (Recess)

15 (Exhibit 8, document Bates stamped  
16 NYP 445 through 446 marked for  
17 identification, as of this date.)

18 THE VIDEOGRAPHER: We are back on  
19 the record, the time is 2:05 p.m. This  
20 is the beginning of tape labeled number  
21 3.

22 Q. Mr. Goodstein, I am going to hand  
23 you what we have just marked as Goodstein 8  
24 and ask you to take a look at that just to  
25 familiarize yourself with it, and for the

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1 GOODSTEIN  
2 record, this is Bates stamped NYP 445 and  
3 446.

4 A. OK.

5 Q. Mr. Goodstein, this is another  
6 executive committee meeting agenda and  
7 minutes, correct?

8 A. Correct.

9 Q. And this is dated 6/12/06?

10 A. Yes.

11 Q. If you could look at the second  
12 page, there is an entry for Tempo. First  
13 question I have, when there is a minute like  
14 this, are these events in chronological  
15 order?

16 MR. LERNER: Objection.

17 A. I don't know.

18 Q. You go to these executive committee  
19 meetings once every week, correct,  
20 approximately?

21 A. Yes.

22 Q. For about six years?

23 A. Six and a half.

24 Q. At the next meeting or at a  
25 meeting, do you review the minutes from the

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1 GOODSTEIN

2 prior meeting?

3 A. Occasionally. Not always.

4 Q. Would it normally be the case when  
5 you have minutes that they be written down in  
6 chronological order?

7 MR. LERNER: Objection.

8 A. I don't know.

9 Q. So here, for instance, when it  
10 says, "Paul explored the idea of  
11 transitioning Tempo into five or six sections  
12 per year geared around key Hispanic events,"  
13 and then it says, "Les recommended." Would  
14 it normally be the case that Paul explored  
15 that and then after that, Les made a  
16 recommendation?

17 MR. LERNER: Objection.

18 A. Again, I don't know.

19 Q. So it could be the case that these  
20 are not in chronological order?

21 MR. LERNER: Objection.

22 A. I don't know.

23 Q. Do you remember -- in the six and a  
24 half years you have been reviewing minutes,  
25 do you remember any of the minutes that were

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on, so the final decision was made -- "The final decision was to give Tempo six more months in its current form, a monthly section, eliminating two FTE positions," is that full-time employee?

A. Yes.

Q. "Tony Martinez and the sales assistant position assigned to Tempo and keeping Sandra Guzman and Sami" -- how do you say Haiman on staff?

A. Yes.

Q. But you're saying you don't know if that decision to keep Sandra Guzman on staff was made at this executive committee meeting on June 12, 2006?

A. Yeah, I don't know.

Q. Do you have any idea when the decision was made to keep Sandra Guzman on staff?

A. I don't know.

Q. Do you recall it being discussed at this meeting?

A. I don't recall.

Q. Then the final sentence, it says,

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"The Wednesday Tempo page will be eliminated." Do you see that?

A. Yes.

Q. Would that be, again, a minute about a decision that was made at the executive committee meeting on that date?

MR. LERNER: Objection.

A. I don't know.

Q. Can you think of any specific instances in which decisions which were made other than at committee meeting were placed in the minutes of the committee meeting?

MR. LERNER: Objection.

Q. Do you understand the question?

A. I don't.

Q. Can you explain why a decision which was not made in a committee meeting would be written in the minutes of a committee meeting saying the final decision was to give Tempo six more months in its current form?

MR. LERNER: Objection.

A. I don't understand your question.

Q. Well, you have been going to these

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meetings for six years, right? These committee meetings?

A. Yes.

Q. And you have been reviewing minutes, not every meeting, but for how many --

A. Occasionally.

Q. Occasionally? And don't the minutes normally reflect what happened during the meeting?

MR. LERNER: Objection.

A. I don't know.

Q. Isn't that the purpose of the minutes?

MR. LERNER: Objection.

Q. You -- you have to answer. Could you answer out loud, please.

A. Yes.

Q. So that is the purpose, normally the purpose?

A. Yes.

Q. OK.?

MR. LERNER: Objection. Move to strike.

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Q. Can we mark this as 9. (Exhibit 9, document Bates stamped NYP 485 through 486 marked for identification, as of this date.)

Q. This is Bates stamped NYP 485 and 486. Just a couple quick things, Mr. Goodstein. Do you see that appears to be another executive committee agenda with minutes attached?

A. Yes.

Q. Is that fair to say that's what this is?

A. Yes.

Q. And this is dated 8/6/07?

A. Yes.

Q. First thing on the first page, it has agenda items, Page Six Magazine, Margie Conklin. Do you see that?

A. Yes.

Q. Who is Margie Conklin?

A. She was the editor of Page Six Magazine.

Q. Do you know when she ceased to be editor of Page Six Magazine?